



South Coast Air Quality Management District

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Review of the PM Hot Spot Interagency Review Form for the Washington Boulevard Project (LAE3085)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the revised or final PM Hot Spot Interagency Review Form as appropriate.

Based on a review of the PM Hotspot Interagency Review Form the SCAQMD staff is concerned about the localized air quality impacts from the proposed project. Specifically, the SCAQMD staff is concerned that the proposed project will add two additional traffic lanes that will facilitate a significant volume of diesel truck traffic within 200 feet of residences (i.e., sensitive receptors) in the City of Commerce. Further, the proposed project appears to be subject to Section 40 CFR 93.123(b)(1)(ii) of the federal conformity rule requiring a quantitative PM_{2.5} and PM₁₀ hot spot analysis.¹ Based on the project description the anticipated future diesel truck traffic volumes are not substantiated and appear to be significantly underestimated based on the traffic analysis and recent environmental studies completed for facilities surrounding the project site. Details regarding these comments are attached to this letter.

The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist

¹ <http://www.gpo.gov/fdsys/pkg/CFR-2011-title40-vol20/pdf/CFR-2011-title40-vol20-sec93-123.pdf>

CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

[IM:DG](#)

TCWGLA3085
Control Number

Criteria for PM2.5 and PM10 Hot Spot Analysis (Background)

Based on a review of the PM Hotspot Interagency Review form the proposed project appears to meet the requirements for a PM2.5 and PM 10 Hot Spot Analysis pursuant to Section 40 CFR 93.123(b)(1)(ii) of the federal conformity rule. Specifically, Section 40 CFR 93.123(b)(1)(ii) states that a quantitative PM2.5 and PM10 spot analysis is required for “projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.” As a result, the information provided in the PM Hotspot Interagency Review Form demonstrates that the project the criteria in this section of the federal conformity rule including the based on the following:

1. Intersection Level of Service

In the project description the lead agency states that the traffic analysis for the proposed project demonstrated substantial improvement in the roadways operating level of service would result from implementation of the project. However, Table 1 (Existing and Future Year (2035) Level of Service) in the PM Hotspot Interagency Review Form does not support this statement. For example, Table 1 indicates that at the intersection of Washington Boulevard and Atlantic Avenue the future level of service (LOS) is E that is worse than the existing LOS at this intersection of D. Therefore, SCAQMD staff recommends that the lead agency provide additional information to substantiate the determination discussed above or prepare a quantitative PM Hotspot analysis consistent with federal guidelines.

2. Significant Diesel Truck Traffic

In Table 2 (Baseline Year, Opening Year and Future Year Traffic Volumes) of the PM Hotspot Interagency Review Form the lead agency indicates that the proposed project will result in less than a 1% increase of heavy duty truck traffic along Washington Boulevard. However, based on the recent Environmental Impact Report Certified by the City of Los Angeles for the Southern California Intermodal Gateway (SCIG) project the Hobart, Commerce and East L.A. Rail Yards are expected to facilitate an increase of approximately six (6) million twenty-foot equivalent units (TEUs) by 2035.² This increase represents a 200% increase of TEUs from the baseline activity at the rail yards directly adjacent to the project site. Consequently, it is reasonable to assume that the proposed project will facilitate this significant increase in diesel truck activity as Washington Boulevard is a major access route for these rail yards. As a result, the traffic analysis appears to substantially underestimate future diesel truck activity (volume) along the project site. Therefore, SCAQMD staff recommends the lead agency revise the traffic analysis to account for the cumulative effect from the significant increase in truck activity (volume) at facilities surrounding the project site. In the event that the lead

² See Appendix G4 (Intermodal Rail Analysis) of the SCIG Final EIR available at: http://www.portoflosangeles.org/EIR/SCIG/FEIR/App_G4_SCIG_FEIR.pdf

agency determines that this increased activity will result in local air quality concerns the lead agency should prepare a quantitative PM Hotspot analysis consistent with federal guidelines.

3. Traffic Analysis

On page 5 of the PM Hotspot Interagency Review Form the lead agency summarizes the traffic analysis for the proposed project. In this summary the lead agency stated that traffic volumes for the proposed project for opening year (2015) and build-out year (2035) were derived by adding an annual traffic volume growth factor of 1% per year, however, the annual average daily traffic volumes reported in Table 2 of the PM Hotspot Interagency Review Form do not reflect this growth assumption (i.e., growth factor of 1%). Based on Table 2 it appears that the reported traffic volumes represent a 0.1% annual growth rate and an overall 2.7% increase in volume between opening year (2015) and build-out year (2035). Therefore, SCAQMD staff recommends that the lead agency revise the traffic analysis to reflect the growth assumptions discussed on page 5 of the PM Hotspot Interagency Review Form or provide additional information to substantiate the traffic conclusions reported in Table 2 of the PM Hotspot Interagency Review Form.